

October 1, 2021

Mr. David Albright
Manager, Groundwater Protection Section
USEPA Region 9 (WTR-4-2)
75 Hawthorne St
San Francisco, CA 94105

Subject: Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1
Monthly Update for AL/AQL Exceedances at Supplemental Monitoring Well M60-O

Dear Mr. Albright:

Florence Copper is providing this monthly update of supplemental monitoring well M60-O alert level (AL) and/or Aquifer Quality Limit (AQL) exceedances under Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1 (Permit).

Florence Copper has been voluntarily monitoring M60-O monthly for the parameters listed in Table 1 (see attached), and last submitted a monthly update report on September 1, 2021. The attached table has been updated to include the most recent laboratory results from the monthly sample collected on August 24, 2021, and received on September 19, 2021. The only alert level exceedance in the August sample was for radon. Adjusted gross alpha values were below the AL/AQL, but the results are included in the table for comparison purposes. Results from the monthly sample collected on September 15, 2021 are pending.

Rinsing activities continue at the PTF wellfield. Injection into well I-02 was discontinued in August to aid recovery efforts on the east side of the wellfield. During September, injection and recovery rates were temporarily reduced while repairs to the primary liner were being undertaken at the BHP Pond. Higher recovery rates are expected to resume when the BHP Pond repairs are completed near the end of September. Hydraulic gradients were maintained throughout the month.

Florence Copper has continued to operate a submersible pump in observation well O-03, where conductivities continue to decrease.

Florence Copper will continue monthly sampling of M60-O for Level I parameters and the parameter which exceeded the ALs and AQLs and will report these results monthly to EPA until all concentrations are below the ALs and AQLs.

Please feel free to contact me should you have any questions or comments.

Sincerely,
Florence Copper, Inc.



Brent Berg
General Manager

Cc: Nancy Rumrill, EPA Region 9
Maribeth Greenslade, ADEQ

Table 1. M60-O Monthly Sampling Results

Parameter	UIC AL	UIC AQL	1/7/21	2/22/21	3/23/21	4/14/21	5/18/21	6/15/21	7/19/21	8/24/21	9/15/21
Adj. gross alpha, (pCi/L)	17.4	17.4	18.7±2.5	7.8±2.4	26.6±2.5	22.2±2.5	11.4±2.6	27.1±2.6	22.4±2.8	10.9±4.3	pending
Radon (pCi/L)	2480	--	NA	NA	NA	3073.6 ±308.1	9129 ±915.6	2985.3 ±299.4	3465.5± 347.5	3066.1± 307.7	pending

BOLD values are exceedance of AL and/or AQL

NA: not analyzed